



United States Department of Justice

United States Attorney's Office Central District of California

Scott Paetty/Ali Moghaddas
Phone: (213) 894-2400
E-mail: scott.paetty.ali.moghaddas@usdoj.gov

1100 United States Courthouse
312 North Spring Street
Los Angeles, California 90012

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VIA E-MAIL

Michael V. Severo
The Severo Law Firm
301 N. Lake Avenue
Suite 315
Pasadena, CA 91101
(626) 844-6400
msevero@mvslaw.com

Charles Snyder
Samual Cross
Alejandro Barrientos
321 E. 2nd Street
Los Angeles, CA 90012
(213) 894-2854
Charles_Snyder@fd.org
Sam_Cross@fd.org
Alejandro_Barrientos@fd.org

Re: United States v. Thomas Vincent Girardi and Christopher Kazuo Kamon,
CR No. 23-47-JLS

Notice of Intent to Introduce Inextricably Intertwined Evidence or Evidence Pursuant to Rule 404(b)

Counsel:

The government hereby gives notice that it may seek to introduce at trial, other crimes, wrongs, or acts committed by defendant Christopher K. Kamon as inextricably intertwined evidence and/or relevant evidence pursuant to Rule 404(b) of the Federal Rules of Evidence.

Notice of Inextricably Intertwined and/or Rule 404(b) Evidence

As you know, defendant Kamon is presently charged in two active criminal matters in this district. The first matter, charged in CR 23-24-JLS, involves his scheme to defraud the Girardi Keese law firm (the "side fraud"). Specifically, the government alleges that between at least 2017 and 2020, defendant Kamon, in his role as the head of accounting of Girardi Keese, embezzled millions of dollars from the law firm's accounts and transferred those funds to bank accounts that he and his co-schemers controlled. The second matter, charged in CR 23-47-JLS, involves defendant Kamon's aiding and abetting defendant Girardi in the misappropriation of client settlement funds held in the Girardi Keese IOLTA accounts and elsewhere (the "overall scheme"). At the upcoming trial for the overall scheme, the government intends to seek admission of evidence related to defendant Kamon's embezzlement of client funds and of defendant Kamon's side fraud, which is at issue in CR 23-24-JLS, because it is direct evidence of and inextricably intertwined with the overall scheme and/or admissible pursuant to Rule 404(b) of the Federal Rules of Evidence.

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First, Kamon's embezzlement of client funds for his personal use is direct evidence of, and at a minimum inextricably intertwined with, the charged conduct in the overall scheme because it is charged in count five of the indictment, which alleges that defendants Girardi and Kamon caused the transfer of approximately \$15,000 from a Girardi Keese operating account to pay charges on defendant Kamon's American Express card that were used to pay for, among other things, renovations to a residence owned by defendant Kamon.

Second, evidence of the side fraud is relevant to prove defendant Kamon's motive, opportunity, intent, preparation, plan, knowledge, absence of mistake, and/or lack of accident for the offenses charged in the overall scheme. Specifically, as outlined in the affidavit in support of the criminal complaint filed in CR 23-24-JLS, defendant Kamon used funds embezzled from Girardi Keese, in part, to finance his lavish lifestyle which included extensive remodeling of his personal properties, the purchase of exotic sports cars, extravagant travel around the world, gambling, and escorts. Moreover, defendant Kamon also paid co-schemers in the side fraud, who in turn provided defendant Kamon with millions of dollars in cash kickbacks. The foregoing is directly relevant to show that defendant Kamon knowingly and intentionally participated in the overall scheme in order to facilitate his ongoing embezzlement in the side fraud.

Please contact us if you believe this notice is insufficient. This notice does not waive or relinquish the government's right to introduce this evidence under any other applicable rule or law. Please let us know if you have any questions, or would like to further discuss any of the matters raised above. The government reserves the right to supplement this notice as necessary.

Respectfully,

/s/

Scott Paetty
Ali Moghaddas
Assistant United States Attorneys